

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO

ENCORE RECEIVABLE MANAGEMENT, INC., et al., Plaintiffs, v. ACE PROPERTY AND CASUALTY INSURANCE CO., et al., Defendants.) CASE NO: 1:12-CV-297))) JUDGE HERMAN J. WEBER)))) <u>STIPULATED LEAVE TO PLEAD</u>))))))
---	---

Counsel for Plaintiffs Encore Receivable Management, Inc. and Convergys Customer Management Group and Defendant American Guarantee Insurance Company (“AGIC”) do hereby stipulate that AGIC shall have up to and including May 25, 2012 in which to move, plead or otherwise answer Plaintiffs’ Complaint. No previous extensions have been granted.

Respectfully submitted,

/s/ James E. Arnold
Per email consent (5/1/12)
JAMES E. ARNOLD
MATTHEW J. BURKHART
James E. Arnold & Associates Co., LPA
115 West Main Street
4th Floor
Columbus, Ohio 43215
Phone: 614-460-1600
Fax: 614-469-1066
Email: jarnold@arnlaw.com

Attorneys for Plaintiffs

/s/ Crystal L. Maluchnik
STEVEN G. JANIK (0021934)
CRYSTAL L. MALUCHNIK (0077875)
JANIK L.L.P.
9200 South Hills Boulevard, Suite 300
Cleveland, Ohio 44147-3521
Phone: 440-838-7600
Fax: 440-838-7601
Email: Steven.Janik@Janiklaw.com
Crystal.Maluchnik@Janiklaw.com

Attorneys for American Guarantee Insurance
Company

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was filed electronically this 1st day of May, 2012. Notice of this filing will be sent to Parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Crystal L. Maluchnik

*One of the Attorneys for Defendant American
Guarantee Insurance Company*